

REMARKS

This is a full and timely response to the Office Action mailed January 25, 2008.

By this Amendment, claims 1 and 12 have been amended to incorporate the subject matter of claim 6. Thus, in view of the amendments to claims 1 and 12, claim 6 has been canceled without prejudice or disclaimer to its underlying subject matter. Thus, claims 1-5 and 7-18 are currently pending in this application. Support for the claim amendments can be readily found variously throughout the specification and the original claims, see, in particular, page 17, lines 8-10; page 18, line 25 to page 19, line 3; page 19, lines 7-10; and page 19, lines 15-24.

In view of these amendments, Applicant believes that all pending claims are in condition for allowance. Reexamination and reconsideration in light of the above amendments and the following remarks is respectfully requested.

Rejection under 35 U.S.C. §112

Claims 1-18 are rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. Applicant believes that the amendments to claims 1 and 12 overcome this rejection by correcting a translation error in which "*a synchronous photography timing controller*" is replaced with *--photographic sequence control means--*. Thus, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. §103

Claims 1, 3-5, 7-10, 12, and 14-17 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Riches (U.S. Patent No. 6,157,409) in view of Sasaki et al. (European Patent Application 1049333). This rejection has been overcome by the incorporation of the limitations of non-rejected claim 6 into claims 1 and 12. Thus, withdrawal of this rejection is respectfully requested.

Further, claims 2 and 13 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Riches in view of Sasaki et al. and in further view of Taylor (U.S. Patent No. 5,659,323). This rejection has been overcome by the incorporation of the limitations of non-rejected

claim 6 into claims 1 and 12 from which claims 2 and 13 directly depends. Thus, withdrawal of this rejection is respectfully requested.

Still further, claims 11 and 18 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Riches in view of Sasaki et al. and in further view of O'Connolly et al. (U.S. Patent No. 6,463,215). This rejection has been overcome by the incorporation of the limitations of non-rejected claim 6 into claims 1 and 12 from which claims 11 and 18 directly or indirectly depends. Thus, withdrawal of this rejection is respectfully requested.

Lastly, claim 6 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Riches in view of Sasaki et al. and in further view of Ikegami et al. (U.S. Patent No. 3,988,530). This rejection has been rendered moot by the cancellation of the rejected claim.

Applicant also wishes to emphasize that the amended claims are patentable over the combined teachings of Riches, Sasaki et al., Taylor, Ikegami et al. and O'Connolly et al.

To establish a *prima facie* case of obviousness, the prior art reference must teach or suggest all the claim limitations. Here, in this case, the cited reference, Riches, in the combinations with Sasaki et al., Taylor, Ikegami et al. and O'Connolly et al. outlined by the Examiner, fails to teach or suggest all the claim limitations with particular emphasis on the limitation “(b) *photographic sequence control means for controlling the image pickup means to repeat an operation to obtain one photograph in a photographic sequence according to an external clock signal supplied from outside the cameras, to reset the photographic sequence once to return to a start state in response to an external reset signal supplied from outside the cameras, and to start photography in response to an external trigger signal supplied from outside the cameras*”

On page 4, lines 9-11, of the Office Action, the Examiner indicates that the Reset feature of the present invention is disclosed in column 4, lines 39-47, of Riches et al. However, based on Applicant's review of the reference, Applicant believes that the Examiner is mistaken in this regard. As stated in claims 1 and 12 above, “reset” in the present invention should be interpreted to mean causing “*the photographic sequence once to return to a start state*” which is completely different

from that which is disclosed in Riches et al. In Riches et al., "reset" means "erase", i.e. "erasing information". In support, Applicant wishes to direct the Examiner's attention to column 4, lines 47-48, which states that "[O]nly one of the devices has no stored image at any one time" which clearly means that the term "reset" in Riches et al. means erasing of information (i.e. "no stored image exists"). Such a meaning is in conflict with the Examiner's interpretation of "reset" in Riches et al. and the limitation (i.e. "*the photographic sequence once to return to a start state*") of the present claims.

In addition, Applicant submits that there is no motivation to combine the teachings of from Riches, Sasaki et al., Taylor, Ikegami et al. and O'Connolly et al. to arrive at the present invention since (1) the teachings of the cited references conflict with each other, (2) the combination proposed by the Examiner renders the apparatus and/or methodology of the cited references unsatisfactory for their intended purpose, or (3) the combination proposed by the Examiner changes the principle of operation of the cited references. In other words, in this case, the Examiner has essentially pick and choose from among the various teachings of the cited references to render obvious the present invention even though the teachings of the cited references would not motivate one skilled in the art to arrive at the combination proposed by the Examiner.

The present invention is directed to a photographic apparatus comprising a plurality of cameras and one synchronous photography timing controller. The single synchronous photography timing controller supplies multiple cameras for synchronous photography with an external clock signal, an external reset signal and external trigger signal. The input clock selector switch is located in each of camera to select either external clock signal or internal clock signal for each particular camera. This would provide additional flexibility for cameras to perform different photographic sequences according to external or internal signals received. (see Fig 2 and page 18, line 14, to page 19, line 6, of the specification). An external reset signal is applied to all cameras after they are synchronized by an external clock signal. This would ensure that the photographic sequences of all cameras are reset and ready for receiving an external trigger signal and starting photography correctly.

Riches discloses an apparatus for high speed imaging in two dimensions. However, as the Examiner correctly notes, Riches does not teach or suggest an external clock signal in his

apparatus. This indicates that the apparatus of Riches is not specifically designed for the purpose of synchronous photography since without an external clock signal, the cameras of Riches will not be synchronized in the progression of their photographic sequence using their internal clock signals. Further, it should also be noted that the cameras in Riches appears to share a single objective lens in his apparatus (see Fig 5 of Riches), which is different from the apparatus of the present application (i.e. each camera has its own optical lens).

The Examiner attempts to cure this deficiency in Riches by citing the teachings of Sasaki et al. which arguably teaches a synchronizing master clock. The synchronous master clock in Sasaki et al. synchronizes operations for various elements in a camera and among various cameras. Sasaki et al. also discloses a timing controller in the camera to ensure that elements in a camera are timely operated via the master clock. However, Applicant notes that there is no discussion in Sasaki et al. regarding switching between an internal clock signal and an external clock signal in a camera. Furthermore, Sasaki et al. does not teach an external reset signal in its monitoring system. Thus, even if the cameras are correctly synchronized in Sasaki et al. by an external master clock, some cameras may not be ready for picking up correct images if the photographic sequences are not reset properly for all cameras.

With regard to the deficiency in Sasaki et al. of failing to disclose an external reset signal, the Examiner cites the teachings of Ikegami et al. Ikegami et al. teaches an automatic surface defect-detecting method and apparatus for detecting surface defects. The automatic surface defect-detecting apparatus comprises a clock switching circuit (see Fig. 2 and in column 5, lines 57-63 of Ikegami et al.) for selecting between an internal clock pulse and an external clock pulse. However, Applicant notes that there are no multiple cameras in Ikegami et al.'s apparatus and its clock switching circuit is not located inside a camera. Thus, Applicant believes that the clock switching circuit of Ikegami et al. cannot be combined with the other references to arrive at the present invention.

With regard to the remaining references of Taylor and O'Connolly et al., the Examiner has cited these references to cure particular deficiencies (i.e. *external trigger signal* and *time lag*) in the combination of Riches and Sasaki et al. However, based on Applicant's review, these references do not teach or suggested other relevant elements of the claimed invention. For example, although

Taylor appears to disclose an external trigger signal, it does not teach its use with an external reset signal which is necessary for synchronous photography as defined by the present claims.

Thus, from these reasons, Applicant submits a prima facie case of obviousness cannot be established. Hence, withdrawal of the present invention is respectfully requested.

CONCLUSION

For the foregoing reasons, all the claims now pending in the present application are believed to be clearly patentable over the outstanding rejections. Accordingly, favorable reconsideration of the claims in light of the above remarks is courteously solicited. If the Examiner has any comments or suggestions that could place this application in even better form, the Examiner is requested to telephone the undersigned attorney at the below-listed number.

Dated: April 24, 2008

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